ORIGINAL

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

OHIO CASUALTY GROUP, as Subrogee of ERIC STAUB

V.

J&J INVESTMENTS MANAGEMENT **COMPANY**

Defendant

V.

AL BUDROW 3975 Craig Avenue Dover, PA 17315

Third-Party Defendant

and

RICHARD WONDERS T/a WONDER GENERAL **CONTRACTING** 2765 Windsor Road Windsor, PA 17366

Third-Party Defendant

:CIVIL ACTION

: NO. CVO1-0785

: JURY TRIAL

DEMANDED

MARY E. D. A. S. 2002

ANSWER to THIRD-PARTY COMPLAINT by **DEFENDANT, BUDROW**

- 1. **Admit**
- 2. **Admit**

- 3. Admit
- 4. Admit
- 5. Admit
- 6. Admit
- 7. Admit
- 8. incorporation of prior allegations no response necessary
- 9. no #9 contained in Complaint Deny
- 10. Admit
- 11. Admit
- 12. Admit
- 13. Admit
- 14. I am without knowledge or information sufficient to form a belief as to the truth of this averment.
- 15. I am without knowledge or information sufficient to form a belief as to the truth of this averment.
- 16. I am without knowledge or information sufficient to form a belief as to the truth of this averment.
- 17. I am without knowledge or information sufficient to form a belief as to the truth of this averment.

- 18. Deny
- 19. incorporation by reference prior allegations no response necessary
- 20. Deny
- 21. Deny
- 22. incorporation by reference prior allegations no response necessary
- 23. Deny
- 24. Deny

WHEREFORE, Third-Party Defendant, Al Budrow demands judgement against Third-Party Plaintiff, J&J Investments, and indemnification for counsel fees, costs of suit, and any other relief the Court deems just and equitable.

Thomas R. Nell 340 Nell Road

East Berlin, PA 17316

Supreme Ct. # 72868

(717)-259-1111

CERTIFICATE OF SERVICE

THOMAS R. NELL, ESQUIRE, hereby certifies that a true and correct copy of the foregoing Third-Party Complaint has been forwarded to counsel listed below by United States first-class mail, on November 6th, 2002, as follows:

James F. Malloy, Esq. Nelson, Levine, DeLuca & Horst Three Valley Square, Suite 280 512 Township Line Road Blue Ball, PA 19422

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Thomas R. Nell